

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., et al., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

Re: Docket No. ____

**ORDER GRANTING LIMITED MODIFICATION OF AUTOMATIC
STAY TO PERMIT ISSUANCE OF AN ARBITRATION AWARD**

This matter coming before the Court on *Lavvan, Inc.’s Motion for Modification of Automatic Stay to Permit Final Resolution of Arbitration Between Lavvan, Inc. and Debtors* (the “**Motion**”)², filed on August 31, 2023; the Court having reviewed the Motion and all related pleadings; and a hearing having been scheduled and, to the extent necessary, held to consider the Motion; and it appearing that the relief requested by the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties-in-interest; and after due deliberation thereon; and having found that notice of the Motion and the hearing was adequate under the circumstances and that no other or further notice is required; and having found that “cause” exists under Section 362(d)(1) of the Bankruptcy Code, 11 U.S.C. § 362(d)(1), for granting the Debtors’ requested relief from the automatic stay imposed by Section 362(a) of the Bankruptcy Code, 11 U.S.C. § 362(a), it is hereby ORDERED as follows:

1. The Motion is GRANTED as set forth herein.

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

² Capitalized terms used but not defined have the meanings used in the Motion.

2. The automatic stay imposed by Section 362(a) of the Bankruptcy Code, 11 U.S.C. § 362(a), is modified to the extent necessary to permit the issuance of a decision in the Arbitration currently pending between Lavvan, Inc. (“**Lavvan**”) and the Debtors in the International Chamber of Commerce International Court of Arbitration.

3. This Order is without prejudice to Lavvan to seek an additional modification of the automatic stay at a later date.

4. This Order shall be fully effective and enforceable immediately upon its entry. The stay otherwise imposed by Bankruptcy Rule 4001(a)(3) is waived.

5. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.